

EXHIBIT H

**All Nippon Airways
vs.
United Airlines**

Deposition of

John Rediger

Volume 1

January 24, 2008

Reported By: Brandon Combs, RPR, CSR 12978
Job: 1-6198

John Rediger

<p style="text-align: right;">Page 86</p> <p>1 Q. What day do they go to?</p> <p>2 A. '86. This is a training record certification</p> <p>3 from TK in '86. Here's one, '86. And here's one for</p> <p>4 '84, certificate of training for -- '79, so as far as I</p> <p>5 know they're all here.</p> <p>6 Q. And what is the archiving that you're pointing</p> <p>7 to right now, sir?</p> <p>8 A. I assume that that's some sort of -- all these</p> <p>9 in here, I don't really know.</p> <p>10 Q. Just read to us what's in the beginning of the</p> <p>11 first of those pages.</p> <p>12 A. United Airlines/flight operations/pilot</p> <p>13 qualifications/core certifications/qualifications. And</p> <p>14 this is /777/777 proficiency check.</p> <p>15 Q. And that has a whole list of documents that it</p> <p>16 indicates are not within the group but have been</p> <p>17 archived in some way?</p> <p>18 A. I don't know. I'd have -- I really don't</p> <p>19 know. This is the first time I've actually looked</p> <p>20 through my training records. This is the first time</p> <p>21 I've seen this form.</p> <p>22 Q. Up until this morning I haven't had the</p> <p>23 opportunity to see them either.</p> <p>24 A. Yeah, so, this is -- here's another United</p> <p>25 Airlines/flight operations/ability qualifications/STARS</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Your file of this accident.</p> <p>2 A. No.</p> <p>3 Q. And I think you've indicated to us you have no</p> <p>4 documents except maybe a copy of your statement?</p> <p>5 A. Right.</p> <p>6 Q. So you wouldn't have a file; correct?</p> <p>7 A. Just, you know, this and whatever -- whatever</p> <p>8 else is in the -- whatever else is in the file.</p> <p>9 Q. What file -- I'm talking about your file.</p> <p>10 A. My file, right.</p> <p>11 Q. You do have a file?</p> <p>12 A. Yes.</p> <p>13 Q. And where is that?</p> <p>14 A. It's at home.</p> <p>15 Q. And what is in that file?</p> <p>16 A. It's just -- what is in it is -- this is in</p> <p>17 it.</p> <p>18 Q. Please read the exhibit number, sir.</p> <p>19 A. Exhibit 4.</p> <p>20 Q. And what else is in it that relates to this</p> <p>21 accident?</p> <p>22 A. And just, you know, some notes I probably made</p> <p>23 at some point during the process to help me write this.</p> <p>24 That's the main thing.</p> <p>25 Q. Anything else?</p>
<p style="text-align: right;">Page 87</p> <p>1 training history.</p> <p>2 Q. Well, is there any -- among any of those</p> <p>3 documents, is there any of the actual material used</p> <p>4 during training?</p> <p>5 A. For training purposes?</p> <p>6 Q. Yeah.</p> <p>7 A. No.</p> <p>8 Q. That's -- you have some proficiency checks in</p> <p>9 there?</p> <p>10 A. Yeah.</p> <p>11 Q. And some test results or completion of</p> <p>12 courses?</p> <p>13 A. Line checks and proficiency checks and</p> <p>14 security trainings.</p> <p>15 Q. But the actual training material is not in</p> <p>16 there?</p> <p>17 A. No.</p> <p>18 Q. And, sir, as I understand it, you brought no</p> <p>19 documents with you --</p> <p>20 A. No.</p> <p>21 Q. -- here to this deposition?</p> <p>22 A. No.</p> <p>23 Q. There are no documents in Exhibit 6 that would</p> <p>24 constitute your file of this accident?</p> <p>25 A. My what?</p>	<p style="text-align: right;">Page 89</p> <p>1 A. No.</p> <p>2 Q. And what are those notes? How many pages are</p> <p>3 they?</p> <p>4 A. Just, I mean, if you put them all together,</p> <p>5 there's probably one or two probably. I don't know. I</p> <p>6 don't recall.</p> <p>7 Q. Sir, please look at Exhibit 4. The accident</p> <p>8 was on October 7, 2004, bottom left-hand corner is a</p> <p>9 date, October 14. Did I just say 2004?</p> <p>10 A. I think you did.</p> <p>11 Q. Withdrawn.</p> <p>12 Sir, please look at Exhibit 4, and as we know</p> <p>13 the accident was on October 7, 2003. Looking down at</p> <p>14 your signature at the bottom, it says October 14, 2003;</p> <p>15 correct?</p> <p>16 A. Yeah.</p> <p>17 Q. Did you prepare anything the day of the</p> <p>18 accident?</p> <p>19 A. We have what's called FSAP, flight safety</p> <p>20 awareness program that within 24 hours of an incident</p> <p>21 like this, or I mean, something that we consider is a</p> <p>22 safety issue, accident, incident, something that affects</p> <p>23 safety, we're supposed to fill out what's called an FSAP</p> <p>24 report. We do that electronically.</p> <p>25 Q. And did you do that in this case?</p>

23 (Pages 86 to 89)

John Rediger

<p style="text-align: right;">Page 90</p> <p>1 A. I did that.</p> <p>2 Q. Did you ever print out a copy of that?</p> <p>3 A. I think what happened is I tried to print it</p> <p>4 and it wouldn't print. I did it at the flight</p> <p>5 operations and it told me that it sent it, but I don't</p> <p>6 think I actually ever got a hard copy of it.</p> <p>7 Q. Who did you address it to?</p> <p>8 A. Go on our company website, Skynet, and you go</p> <p>9 to the FSAP report section of the website and you just</p> <p>10 electronically fill it out and answer the questions.</p> <p>11 Q. After the accident, did you prepare the FSAP</p> <p>12 report the first day, the day of the accident?</p> <p>13 A. I did.</p> <p>14 Q. Did you prepare any other reports other than</p> <p>15 the FSAP and Exhibit 4?</p> <p>16 A. No. Not that day.</p> <p>17 Q. On any day did you --</p> <p>18 A. After --</p> <p>19 Q. Excuse me, sir.</p> <p>20 On any day after the accident, did you prepare</p> <p>21 any report other than the FSAP report and Exhibit 4</p> <p>22 concerning this accident?</p> <p>23 A. Not a report, no.</p> <p>24 Q. Did you prepare any material concerning this</p> <p>25 accident other than Exhibit 4 and your FSAP report?</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. Did you ever receive any written material,</p> <p>2 minutes, notes, preparation material, either before,</p> <p>3 during or after that meeting?</p> <p>4 A. No.</p> <p>5 Q. You've never seen a single word in writing</p> <p>6 about that meeting or as a result of that meeting; is</p> <p>7 that correct?</p> <p>8 A. Not that I can recall.</p> <p>9 Q. Did you see anything online on the company</p> <p>10 email about that inquiry?</p> <p>11 A. This particular incident?</p> <p>12 Q. Yes.</p> <p>13 A. No, I didn't.</p> <p>14 Q. Did you ever learn the results of that</p> <p>15 inquiry?</p> <p>16 A. No.</p> <p>17 Q. Have you, to this day, seen any sort of action</p> <p>18 or procedure that resulted from this accident?</p> <p>19 A. No.</p> <p>20 Q. Are you aware of any procedures that have</p> <p>21 changed as a result of this accident?</p> <p>22 A. No.</p> <p>23 Q. Have you observed any differences in the</p> <p>24 activities of the push crew at gate 102 as a result of</p> <p>25 this accident?</p>
<p style="text-align: right;">Page 91</p> <p>1 A. No.</p> <p>2 Q. Did anyone interview you?</p> <p>3 A. No.</p> <p>4 Q. You had no interviews. I think you did</p> <p>5 mention you met with Mr. Torpey this week.</p> <p>6 A. Right.</p> <p>7 Q. But other than that, did anyone interview you</p> <p>8 about this accident at any time since the moment of the</p> <p>9 accident until today?</p> <p>10 A. We had a flight safety inquiry. That was</p> <p>11 after -- that's subsequent to the FSAP report. They</p> <p>12 determine at that time whether there needs to be a</p> <p>13 flight safety inquiry. And what it is, it's a</p> <p>14 conference phone call between the training center,</p> <p>15 flight management, the pilots, our ALPA, which is our</p> <p>16 union representatives. And what they try to do, it's an</p> <p>17 inquiry, trying to interview us over the phone, trying</p> <p>18 to determine more in-depth what happened.</p> <p>19 Q. And when did that phone conference call occur?</p> <p>20 A. I don't recall. It was -- I just don't really</p> <p>21 recall when it occurred.</p> <p>22 Q. Was it, you know, more than a few weeks after</p> <p>23 the accident?</p> <p>24 A. Probably, yeah, more than a few weeks. But</p> <p>25 I'm not certain.</p>	<p style="text-align: right;">Page 93</p> <p>1 A. I don't really think I've been out of gate</p> <p>2 102, believe it or not, since that incident. And</p> <p>3 that -- I never get there. I'm not sure why, but I</p> <p>4 really don't think -- I've been out of 100 a couple</p> <p>5 times, but I don't think I've really been out of 102.</p> <p>6 Q. Have you been out of most of the 90s gate --</p> <p>7 excuse me. Sir, gate G in the 90s, 91 through 99?</p> <p>8 A. Yes.</p> <p>9 Q. But not once out of gate 102?</p> <p>10 A. Probably I might have, but I can't really</p> <p>11 recall if I was or not. I know that I go to 100 a few</p> <p>12 times, but I'm not sure why not 102.</p> <p>13 Q. Going back to Exhibit 4, your statement, sir,</p> <p>14 between the accident on October 7, 2003, and your</p> <p>15 writing this report on October 14, 2003, during that</p> <p>16 week that transpired, did you talk with anybody about</p> <p>17 this accident?</p> <p>18 A. Did I talk with anybody about this accident?</p> <p>19 I don't recall specifically. I probably talked with</p> <p>20 some ALPA people, flight safety at ALPA.</p> <p>21 Q. Other than your union people, ALPA, did you</p> <p>22 speak with anyone else?</p> <p>23 A. No.</p> <p>24 Q. To whom did you submit this report, Exhibit 4?</p> <p>25 A. You know, I don't recall specifically who it</p>
<p style="text-align: right;">Page 90</p> <p>1 A. I did that.</p> <p>2 Q. Did you ever print out a copy of that?</p> <p>3 A. I think what happened is I tried to print it</p> <p>4 and it wouldn't print. I did it at the flight</p> <p>5 operations and it told me that it sent it, but I don't</p> <p>6 think I actually ever got a hard copy of it.</p> <p>7 Q. Who did you address it to?</p> <p>8 A. Go on our company website, Skynet, and you go</p> <p>9 to the FSAP report section of the website and you just</p> <p>10 electronically fill it out and answer the questions.</p> <p>11 Q. After the accident, did you prepare the FSAP</p> <p>12 report the first day, the day of the accident?</p> <p>13 A. I did.</p> <p>14 Q. Did you prepare any other reports other than</p> <p>15 the FSAP and Exhibit 4?</p> <p>16 A. No. Not that day.</p> <p>17 Q. On any day did you --</p> <p>18 A. After --</p> <p>19 Q. Excuse me, sir.</p> <p>20 On any day after the accident, did you prepare</p> <p>21 any report other than the FSAP report and Exhibit 4</p> <p>22 concerning this accident?</p> <p>23 A. Not a report, no.</p> <p>24 Q. Did you prepare any material concerning this</p> <p>25 accident other than Exhibit 4 and your FSAP report?</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. Did you ever receive any written material,</p> <p>2 minutes, notes, preparation material, either before,</p> <p>3 during or after that meeting?</p> <p>4 A. No.</p> <p>5 Q. You've never seen a single word in writing</p> <p>6 about that meeting or as a result of that meeting; is</p> <p>7 that correct?</p> <p>8 A. Not that I can recall.</p> <p>9 Q. Did you see anything online on the company</p> <p>10 email about that inquiry?</p> <p>11 A. This particular incident?</p> <p>12 Q. Yes.</p> <p>13 A. No, I didn't.</p> <p>14 Q. Did you ever learn the results of that</p> <p>15 inquiry?</p> <p>16 A. No.</p> <p>17 Q. Have you, to this day, seen any sort of action</p> <p>18 or procedure that resulted from this accident?</p> <p>19 A. No.</p> <p>20 Q. Are you aware of any procedures that have</p> <p>21 changed as a result of this accident?</p> <p>22 A. No.</p> <p>23 Q. Have you observed any differences in the</p> <p>24 activities of the push crew at gate 102 as a result of</p> <p>25 this accident?</p>
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24 (Pages 90 to 93)

John Rediger

<p style="text-align: right;">Page 102</p> <p>1 international airports and stuff, but as far as I 2 remember there was none here. This would be the main 3 page that I would go to.</p> <p>4 Q. And the five pages appear to be complete as 5 far as ground operations go, of Exhibit 9 to Russell's 6 deposition?</p> <p>7 It appears to be complete, sir?</p> <p>8 A. Appears to be.</p> <p>9 Q. Have you brought with you here today any 10 documents reflecting the routing that Flight 809 11 requested for October 7, 2003?</p> <p>12 A. No.</p> <p>13 Q. Have you brought with you here today any 14 documents reflecting the routing that was assigned for 15 Flight 809?</p> <p>16 A. No.</p> <p>17 Q. Has anyone asked you to gather those 18 documents?</p> <p>19 A. No.</p> <p>20 Q. Have you seen those documents anywhere?</p> <p>21 A. No.</p> <p>22 Q. Do you know if those documents exist?</p> <p>23 A. No.</p> <p>24 Q. Haven't made any effort to search for those, 25 have you?</p>	<p style="text-align: right;">Page 104</p> <p>1 time on the monitor is 12:23. 2 (Noon recess taken.) 3 THE VIDEOGRAPHER: Coming back on the record. 4 The time on the monitor is 1:37 p.m. 5 Please begin. 6 MR. TURNER: Q. Hope you had a good lunch, 7 sir. 8 A. I did. 9 Q. Let me ask you, have you ever been involved in 10 any other accident or incident in connection with any 11 airplane at any time? 12 A. No. 13 Q. Have you ever been involved in any accident or 14 incident at United Airlines? 15 A. No. 16 Q. Have you ever been reprimanded by 17 United Airlines for any reason? 18 A. No. 19 Q. Have you ever been suspended by 20 United Airlines for any reason? 21 A. No. 22 Q. I think you did mention that you did get 23 furloughed back in the old furlough days? 24 A. I did. 25 Q. Can you give us a little bit of what that was</p>
<p style="text-align: right;">Page 103</p> <p>1 A. No. 2 Q. Nobody asked you to? 3 A. No. 4 Q. Do you know, sir, whether or not the flight 5 plan for the accident flight is still available? 6 A. Yes. 7 Q. You saw it this week? 8 A. Saw it -- I didn't look it over or anything, 9 but I saw it. 10 Q. Have you seen any document indicating that 11 there have been any changes in the procedures in ramp 12 Tower G as a result of this accident? 13 A. No. 14 Q. Has anyone ever told you that there have been 15 changes in the procedures at ramp Tower G as a result of 16 this accident? 17 A. No. 18 Q. Has anyone told you that any of the procedures 19 with regard to gate G102 have been changed -- 20 A. No. 21 Q. -- as a result of this accident? 22 A. No. 23 MR. TURNER: It's almost 12:30, why don't we 24 take lunch, and we'll see you back in an hour. 25 THE VIDEOGRAPHER: Going off the record. The</p>	<p style="text-align: right;">Page 105</p> <p>1 about. 2 A. In regards to what I did you mean? 3 Q. No. The reasons how the furloughs came about. 4 A. It was just economics, you know, very cyclic 5 industry at the time. And I got hired, I assumed that I 6 would be getting furloughed at some time. 7 Q. And what time period was that? 8 A. I was hired in '79 and furloughed in '80. 9 Q. And the furloughs were based on seniority 10 primarily? 11 A. That is correct. 12 Q. You had told us that there was a conference 13 call that you were in on sometime after the accident? 14 A. Uh-huh. 15 Q. I think -- did you call that a flight safety 16 inquiry? 17 A. FSI, that's correct. 18 Q. And do you know any of the trainers who were 19 on that conference call? 20 A. Well, there was trainers or people that were 21 on the conference call. I don't know if they would be 22 called trainers or not. 23 Q. I thought you mentioned some people that were 24 involved in training were on there. 25 A. The training center was. They have</p>

27 (Pages 102 to 105)